

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS

FILED

JUN 19 2007

CLERK, U.S. DISTRICT COURT

By

Deputy

UNITED STATES OF AMERICA

v.

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§ No.

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307 CR 0.196 - B

FILED UNDER SEAL

STUART ROSSOFF

(1)

a/k/a "Michael Knight"

JASON TROWBRIDGE

(2)

a/k/a "Jason from California" and
"John from California"

CHAD WARD

(3)

a/k/a "Dark Angel"

ANGELA ROBBERSON

(4)

a/k/a "Amber" and "Lil Miss Angela"

INDICTMENT

The Grand Jury Charges:

Count One

Conspiracy to Use Access Devices to Modify Telecommunications
Instruments and to Access Protected Telecommunications Computers
(Violation of 18 U.S.C. § 371 (18 U.S.C. §§ 1029(a)(9) and 1030(a)(5)(A)(ii))

Beginning in or about January 2004 and continuing through the date of the indictment, in the Dallas Division of the Northern District of Texas and elsewhere, defendants, **Stuart Rosoff**, also known as Michael Knight, **Jason Trowbridge**, also known as Jason from California and John from California, **Chad Ward**, also known as Dark Angel, and **Angela Robberson**, also known as Amber and Lil Miss Angela, did unlawfully, willfully, and knowingly combine, conspire, confederate and agree among themselves and with each other and with other persons known and unknown to the Grand Jury, to commit offenses against the United States, to wit: (1) to knowingly use, traffic in,

possess and control hardware and software, knowing it had been configured to modify telecommunication identifying information associated with and contained in a telecommunications instrument so that such instrument could be used to obtain telecommunications service without authorization in violation of 18 U.S.C. § 1029(a)(9); and (2) to intentionally access a protected computer, as that term is defined at 18 U.S.C. § 1030(e)(2)(B), without authorization, and as a result of such conduct, recklessly cause damage in violation of 18 U.S.C. § 1030(a)(5)(A)(ii).

Manner and Means

2. It was part of the conspiracy that:

A. Defendants, **Rosoff, Trowbridge, Ward, Robberson**, along with other persons known and unknown to the Grand Jury, were members of and participated in a telephone chat/party line in which they taught participants how to make false 911 calls or “swatting” calls which concealed the true caller identification information (Caller I.D.) and which made false reports of violent crimes designed to elicit a police Special Weapons And Tactics squad (SWAT) response to the addresses of targeted members of the telephone chat/party line, their family members and others.

B. Defendant **Rosoff** was highly-skilled at manipulating telephone systems and networks, i.e. a “phone phreaker.” **Rosoff** used “social engineering” or subterfuge to acquire sensitive information from telephone service providers by impersonating telephone company employees. The sensitive information obtained by **Rosoff** enabled him to exploit telephone network computer servers by: (1) obtaining subscriber information; (2) altering billing information and phone service plans; and (3) redirecting,

changing service charges and discontinuing phone service. **Rosoff** participated in the conspiracy by: (1) directing and instructing coconspirators on the technical aspects of “spoofing” Caller I.D. for “swatting” 911 calls; (2) targeting victims for “swatting” 911 calls; (3) possessing and trafficking in “spoof” cards to conceal Caller I.D. ; (4) obtaining unauthorized access to telecommunication facilities in order to obtain personal identification information, toll records, call histories and billing information of victims for “swatting” 911 calls; (5) participating in “swatting” 911 calls; and (6) extorting money and services from the victims of “swatting” 911 calls. **Rosoff** also extorted money from other telephone chat/party line participants by threatening to “swat” them or use his skill to interfere with their telephone services.

C. M. W., also known as “Little Hacker,” a minor person known to the Grand Jury, who was a member of the telephone chat/ party line, and who was also a “phone phreaker,” made unauthorized access to telecommunications systems for the purpose of: (1) “spoofing” Caller I.D. so that “swatting” 911 calls could be made by himself, **Rosoff**, **Trowbridge**, **Ward** and other persons known and unknown to the Grand Jury; (2) making unauthorized interceptions of private third-party electronic communications by participants in the telephone chat/party line; (3) fraudulently obtaining telephone services from telecommunications companies for himself, **Rosoff**, **Trowbridge** and others; (4) fraudulently terminating services to telecommunications customers without authorization at the request of defendants **Rosoff**, **Trowbridge**, **Ward** and others; (5) obtaining personal identification information of targeted victims from telecommunications companies without authorization to facilitate “swatting” 911 calls; (6) participating in

“swatting” 911 calls; and (7) making threats of “swatting” 911 calls to obtain phone sex and money from other telephone chat/party line participants.

D. Defendant **Ward** participated in the conspiracy by: (1) purchasing and trafficking in commercially available “spoof” cards, i.e. commercially available access devices used to conceal the true Caller I.D., for use in “spoofing” Caller I.D. to make “swatting” 911 calls; (2) offering to provide and providing financing to coconspirators to make false 911 calls; (3) targeting victims for “swatting” by himself and others; and (4) participating in “swatting” 911 calls made by the conspirators.

E. Defendant **Trowbridge** participated in the conspiracy by: (1) exceeding authorized access to Lexis/Nexis, a commercial database, in order to obtain personal identification information, i.e. telephone numbers, addresses and names of targeted victims and their family members for use in “swatting” 911 calls; (2) participating in “swatting” 911 calls made by himself and others; (3) targeting victims for “swatting;” and (3) purchasing “spoof” cards for use in making “swatting” 911 calls.

F. Defendant **Robberson** participated in the conspiracy by: (1) targeting victims for “swatting”, and (2) providing personal identification information, i.e. telephone numbers, address and names of targeted victims and their family members for use in “swatting” 911 calls.

G. Defendants **Rosoff, Trowbridge, Ward**, along with persons known and unknown to the Grand Jury, fabricated emergency scenarios involving violence which were reported to the 911 operators to solicit SWAT responses to the targeted victims’ physical addresses.

H. Defendant **Rosoff** and M. W. “slammed” or changed victims’ telecommunications providers without authorization; terminated victims’ telecommunications services without authorization; initiated and modified telecommunications services for **Rosoff, Ward, Trowbridge** and other persons known and unknown to the Grand Jury without the authorization of the telecommunications providers or account holders.

Overt Acts

In furtherance of the conspiracy and to achieve its objects, defendants **Rosoff, Trowbridge, Ward, Robberson**, along with persons known and unknown to the Grand Jury, committed and caused to be committed, among others, the following overt acts in the Northern District of Texas, and elsewhere:

1. In or about June, 2006, defendant **Trowbridge** made unauthorized access to a commercial database for the purpose of obtaining the address of a targeted telephone chat/party line participant, known to the Grand Jury, and her parents, in order to provide that information to Guadalupe Santana Martinez who initiated a “swatting” 911 call, directing a SWAT response to the parents’ address in Alvarado, Texas.

2. On or about June 12, 2006, Guadalupe Santana Martinez called the 911 emergency services for the City of Cleburne, Texas, using a commercially available spoof card provided by defendant **Ward**, and a Skype phone (a VoIP or voice over internet protocol telephone service). Martinez identified himself to the 911 operator as the father of the targeted telephone chat/ party line participant, and stated that he had shot and killed members of the family, that he was holding hostages, that he was using hallucinogenic

drugs, that he was armed with an AK47, and he demanded \$50,000 and transportation across the U.S. border to Mexico or he would kill the remaining hostages. Martinez placed the call from outside the State of Texas using VoIP and a spoof card to conceal his true identity, in order to make it appear to emergency services that the call was a true emergency from the address associated with the telephone identification number that had been spoofed.

3. In or about July, 2006 defendant **Trowbridge** made unauthorized access to the Lexis/Nexis database for the purpose of obtaining personal information on a targeted individual who lived in Alabama, and provided the information to defendant **Rosoff**.

4. In or about September 2006, defendant **Trowbridge** asked Guadalupe Santana Martinez to "swat" defendant **Ward**, and provided Martinez with **Ward's** full name, address, and telephone number. In payment for swatting **Ward**, **Trowbridge** provided Martinez with the address, phone number and full name of another telephone chat/party line participant. The "swatting" 911 call was made by Martinez from the telephone chat/party line and listened to by **Trowbridge**, **Rosoff** and other persons known and unknown to the Grand Jury.

5. In or about September 2006, defendant **Ward** offered Guadalupe Santana Martinez \$500 to "swat" defendant **Trowbridge**.

6. On or about October 1, 2006, in a telephone chat/party line room, defendant **Ward** offered \$300 to anyone who would "swat" a targeted telephone chat/party line participant. Martinez agreed to make the "swatting" 911 call, and defendants **Ward** and **Trowbridge** listened in on the call. **Rosoff** provided Guadalupe Santana Martinez with

the address which **Rosoff** had obtained from the unauthorized monitoring of the targeted person's calling information through an "in-bounce trace" on a telephone systems server. During the "swatting" call, Martinez called the 911 emergency services for the City of Fort Worth, Texas and identified himself as the father of the targeted individual, and again stated that he had shot and killed members of the targeted individual's family, that he was holding hostages, that he was using hallucinogenic drugs, that he was armed, and he threatened to kill the remaining hostages. Martinez spoofed his Caller I.D..

7. On or about October 6, 2006, M. W. made an unauthorized access to the Network Operations Center at the Verizon Provisioning Center located at Irving, Texas to obtain information for use in concealing Caller I.D. by the coconspirators and to obtain personal identity information for targeting victims.

8. On or about October 8, 2006, M. W. made an unauthorized access to the computer equipment of CTS Telecommunications, a subdivision of AT&T, in Grand Prairie, Texas to obtain information for use in concealing Caller I.D. and to obtain personal identity information for targeting victims.

9. On or about November 22, 2006, defendant **Ward** offered Guadalupe Santana Martinez \$300 if Martinez would make another "swatting" 911 call to the parents of a targeted telephone chat/party line participant. At the time that Ward made the offer to Martinez in exchange for Martinez making a "swatting" 911 call to the target's parents, **Ward** knew that previous "swatting" 911 calls had caused injuries.

10. In or about October 2006, defendant **Robberson** obtained personal identity information for use in targeting "swatting" 911 calls.

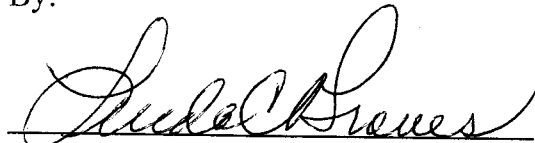
11. In or about October 2006, defendant **Robberson** warned defendant **Trowbridge** not to leave additional voice mail threats to **Ward**, who they were targetting for a "swatting" 911 call, in order to conceal their planned criminal conduct.

All in violation of 18 U.S.C. § 371 (18 U.S.C. §§ 1029(a)(9) and 1030(a)(5)(A)(ii)).

A TRUE BILL

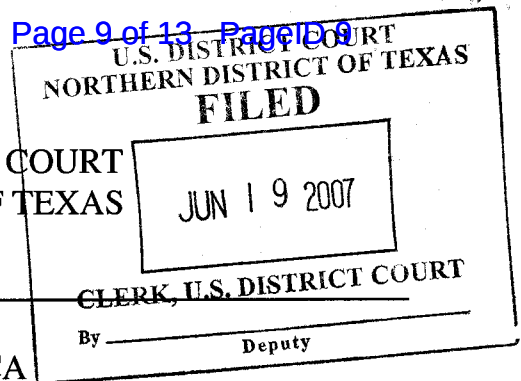
FOR **REDACTED**

RICHARD B. ROPER
UNITED STATES ATTORNEY
By:



LINDA C. GROVES
Assistant United States Attorney
Texas Bar No. 08553100
1100 Commerce Street, Third Floor
Dallas, Texas 75242
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Facsimile: 214.767.2846
Linda.Groves@usdoj.gov

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION



UNITED STATES OF AMERICA

v.

307 CR 0.196 - B

STUART ROSOFF (1)
JASON TROWBRIDGE (2)
CHAD WARD (3)
ANGELA ROBBERSON (4)

SEALED INDICTMENT

18 U.S.C. § 371 (18 U.S.C. §§ 1029 (a)(9) and 1030(a)(5)(A)(ii)
Conspiracy to use access devices to modify telecommunications
instruments and to access protected telecommunications computers

1Count

A true bill rendered:

REDACTED

DALLAS

Filed in open court this 19 day of Jun, A.D. 2007.

Clerk

Issue Arrest Warrant

Wm F. Sanderson Jr.
UNITED STATES DISTRICT MAGISTRATE JUDGE

No Pending Criminal Complaint

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS

Case 3:07-cr-00196-B Document 1 Filed 06/19/07 Page 10 of 13 PageID 10

Related Case Information

Superseding Indictment: ☐ Yes ☒ No New Defendant: ☒ Yes ☐ No
Pending CR Case in NDTX: ☐ Yes ☒ No If Yes, number: _____
Search Warrant Case Number N/A
R 20 from District of N/A
Magistrate Case Number N/A

307 CR 0196-B

1. Defendant Information

Juvenile: ☐ Yes ☒ No

If Yes, Matter to be sealed:

☒ Yes ☐ No

Defendant Name

ANGELA ROBBERTSON aka Amber

Alias Name

LA

Address

Quincy 1400

REDACTED

County in which offense was committed:

2. U.S. Attorney Information

AUSA

LINDA GROVES

Bar #

08553100

3. Interpreter

☐ Yes ☒ No

If Yes, list language and/or dialect: _____

4. Location Status

last known address

Arrest Date Issue arrest warrant

☐ Already in Federal Custody as of _____ in _____

☐ Already in State Custody

☐ On Pretrial Release

5. U.S.C. Citations

Total # of Counts as to This Defendant: 1

☐ Petty

☐ Misdemeanor

☒ Felony

Citation

18 USC 371

Description of Offense Charged

CONSPIRACY

Count(s)

1

(May be continued on reverse)

Date

6/12/07

Signature of AUSA:

Linda C. Groves

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS

Case 3:07-cr-00196-B Document 1 Filed 06/19/07 Page 11 of 13 PageID 11

Related Case Information

Superseding Indictment: ☐ Yes ☒ No New Defendant: ☒ Yes ☐ No

Pending CR Case in NDTX: ☐ Yes ☒ No If Yes, number: _____

Search Warrant Case Number N/A

R 20 from District of N/A

Magistrate Case Number N/A

1. Defendant Information

Juvenile: ☐ Yes ☒ No

If Yes, Matter to be sealed:

☒ Yes ☐ No

Defendant Name

Chad Ward

Alias Name

Address

see last known address below

County in which offense was committed:

Dallas and elsewhere

2. U.S. Attorney Information

AUSA

LINDA GROVES

Bar #

08553100

3. Interpreter

☐ Yes ☒ No

If Yes, list language and/or dialect: _____

4. Location Status

last known address

Arrest Date Issue arrest warrant

☐ Already in Federal Custody as of _____ in _____

☐ Already in State Custody

☐ On Pretrial Release

5. U.S.C. Citations

Total # of Counts as to This Defendant: 1

☐ Petty

☐ Misdemeanor

☒ Felony

Citation

18 USC 371

Description of Offense Charged

conspiracy

Count(s)

1

(May be continued on reverse)

Date

6-12-07

Signature of AUSA:

Linda Groves

1. Defendant Information

Juvenile: ☐ Yes ☒ No

If Yes, Matter to be sealed:

☒ Yes ☐ No

Pending CR Case in NDTX: ☐ Yes ☒ No If Yes, number: _____

Search Warrant Case Number N/A

R 20 from District of N/A

Magistrate Case Number N/A

307 CR 0196-R

Defendant Name JASON TROWBRIDGE

Alias Name _____

Address Eastman

REDACTED

County in which offense was committed: _____

2. U.S. Attorney Information

AUSA LINDA GROVES

Bar # 08553100

3. Interpreter

☐ Yes ☒ No

If Yes, list language and/or dialect: _____

4. Location Status

Arrest Date Issue arrest warrant

☐ Already in Federal Custody as of _____ in _____
☐ Already in State Custody
☐ On Pretrial Release

5. U.S.C. Citations

Total # of Counts as to This Defendant: 1 ☐ Petty ☐ Misdemeanor ☒ Felony

Citation	Description of Offense Charged	Count(s)
<u>18 USC § 371</u>	<u>conspiracy</u>	<u>1</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

(May be continued on reverse)

Date 6/12/07

Signature of AUSA: Linda Groves

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS

Case 3:07-cr-00196-B Document 1 Filed 06/19/07 Page 13 of 13 PageID 13

Related Case Information

Superseding Indictment: ☐ Yes ☒ No New Defendant: ☒ Yes ☐ No

Pending CR Case in NDTX: ☐ Yes ☒ No If Yes, number: _____

Search Warrant Case Number N/A

R 20 from District of N/A

Magistrate Case Number N/A

307 CR 0.196-B

1. Defendant Information

Juvenile: ☐ Yes ☒ No

If Yes, Matter to be sealed:

☒ Yes ☐ No

Defendant Name

Stuart F. Rosoff

Alias Name

Michael Knight; Michael Moore; Samuel Moore

Address

Samuel Ellis

Last known address

County in which offense was committed:

Dallas

REDACTED

2. U.S. Attorney Information

AUSA LINDA GROVES

Bar # 08553100

3. Interpreter

☐ Yes ☒ No

If Yes, list language and/or dialect: _____

4. Location Status unknown

Arrest Date Issue arrest warrant

☐ Already in Federal Custody as of _____ in _____
☐ Already in State Custody
☐ On Pretrial Release

5. U.S.C. Citations

Total # of Counts as to This Defendant: 1 ☐ Petty ☐ Misdemeanor ☒ Felony

Citation	Description of Offense Charged	Count(s)
<u>18 USC 371</u>	<u>conspiracy</u>	<u>1</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

(May be continued on reverse)

Date 6/12/07

Signature of AUSA:

Linda C. Groves